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LAW OFFICE OF HOWARD K. K. LUKE
Attorneys at Law

HOWARD K. K. LUKE 2049
DAVID M. HAYAKAWA 4522
841 Bishop Street, Suite 2022
Honolulu, Hawaii 96813
Tel.: (808) 545-5000
Fax: (808) 523-9137
Email: howardkkluke@hawaii.rr.com

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

APR 19 2006 Ag
at 11 o'clock and 10 min AM
SUE BEITIA, CLERK

Attorneys for Defendant
BRENDA M. O. CHUNG (02)

LODGED

APR 13 2006
12:30 PM
CLERK, U. S. DISTRICT COURT
DISTRICT OF HAWAII

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 02-00225 DAE
)	
Plaintiff,)	STIPULATION AND ORDER
)	ALLOWING TRAVEL BY
vs.)	DEFENDANT BRENDA M. O.
)	CHUNG (02)
ANDY S. S. YIP, (01))	
BRENDA M. O. CHUNG, (02))	
)	
Defendants.)	
)	

STIPULATION AND ORDER ALLOWING
TRAVEL BY DEFENDANT BRENDA M. O. CHUNG (02)

IT IS HEREBY STIPULATED, by and between the parties hereto,
that Defendant Brenda M. O. Chung (02) be permitted to travel:

(A) from June 2, 2006 through June 6, 2006 to Las Vegas, Nevada,
for the business-related purpose of attending the JCK Jewelry Fair; and

(B) with her passport from May 16, 2006 through May 30, 2006, to Hong Kong and China, for business-related purposes, including attending meetings with various jewelry boutiques.

IT IS FURTHER STIPULATED that:

(1) Prior to the obtaining of her passport and departure from the jurisdiction of this Court, Defendant shall provide to Pretrial Services a complete and detailed itinerary of her travel, including all dates and places where she shall be throughout the period of her travel, and shall provide such other information requested by Pretrial Services;

(2) Defendant may pick up her passport from the Clerk of this Court no earlier than May 1, 2006, and Defendant must return her passport to the Clerk of this Court no later than May 31, 2006. Defendant is being permitted to pick up her passport at an early date, as Defendant's passport is required in order for Defendant to obtain a visa for entry into China;

(3) There shall be no contact, either directly or indirectly, by Defendant or by any person acting on her behalf, with the Government's cooperating witness named "E.D." in its second superseding indictment;

(4) Any variance from the itinerary provided by Defendant to Pretrial Services shall constitute a violation of this Court's order, and any contact

with the person referenced in paragraph 2 hereinabove, in any manner described in paragraph 2 hereinabove, shall constitute a violation of this order;

(5) Any violation of this order shall subject Defendant to a revocation of her pretrial release in this case;

(6) Any violation of this order shall subject Defendant to additional penalties as provided by law in the instant case;

(7) Any violation of this order shall subject Defendant to new and additional charges in a separate criminal proceeding as provided by law.

SO STIPULATED.

DATED: Honolulu, Hawaii,

4/14/06


LESLIE E. OSBORNE, JR., A.U.S.A.
Attorney for Plaintiff United States of America


HOWARD K. K. LUKE
Attorney for Defendant Brenda M. O. Chung (02)


JULIE WALL, U.S. Pretrial Services Officer

APPROVED & SO ORDERED:


Judge of the Above-Entitled Court

Cr. No. 02-00225 DAE, U.S. v. Brenda M. O. Chung (02)
Stipulation and Order Allowing Travel by Defendant Brenda M. O. Chung (02)